

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DOLORES C. OMOREBOKHAE

Plaintiff

-against-

08CV1512 (JUDGE MARRERO)

U-HAUL CO. OF NEW JERSEY, INC., and  
U-HAUL INTERNATIONAL, INC.

Defendants

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**PLAINTIFF DOLORES OMOREBOKHAE'S INITIAL DISCLOSURE PURSUANT  
TO RULE 26(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff Delores C. Omorebokhae, by and through her attorney, Joseph Fleming, Esq., P.C., makes the following initial disclosures:

A. WITNESSES

The following individuals are likely to have discoverable information that Plaintiff may use in support of his claims:

1. Delores C. Omorebokhae  
20 West Mosholu Parkway South, Apt. 7G  
Bronx, NY 10468

Subject of Information: How the accident occurred. Nature and extent of injuries suffered.

2. Wallace Cooke  
31-06 East Buell Street  
E. Elmhurst, NY 11369-1915

Subject of Information: How accident occurred. Defendant's negligence.

3. Dr. John Nailor  
220 East 161<sup>st</sup> Street  
Bronx, NY 10451

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

4. Dr. William Schell  
Riverside Orthopaedic & Sports Medicine Associates  
36 West 60<sup>th</sup> Street  
New York, NY 10023

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

5. Dr. Gabriel Dassa  
4377 Bronx Boulevard  
Bronx, NY 10466

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

B. DOCUMENTS

A description by category and location, of all documents, electronically stored information, and tangible things that Plaintiff has in his possession, custody and control and may use to support his claims are as follows.

Unless otherwise stated, all documents, information, and things described below are in the possession of Plaintiff's counsel, Joseph Fleming, Esq., P.C., at 116 John Street, Suite 2830, New York, NY 10038:

1. Police Report.
2. Rental Agreement between Wallace Cooke and Defendant.
3. Authorization for Plaintiff's medical records.

Plaintiff reserves the right to identify other documents, as such documents come into Plaintiff's possession and control.

C. DAMAGES

Plaintiff's calculation of damages are based on the following:

1. Past and future pain and suffering: \$ 5,000,000.00

Total Damages: \$ 5,000,000.00

Plaintiff has also suffered damages in an amount to be determined, for legal fees and costs associated with this action.

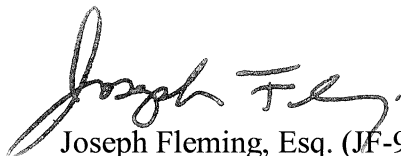
D. INSURANCE

Plaintiff is not now aware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgement in this action.

E. EXPERTS

Plaintiff has not yet retained the services of or consulted with, any expert whose testimony would be presented at trial.

DATED: New York, New York  
June 18, 2008



Joseph Fleming, Esq. (JF-9542)

Joseph Fleming, Esq., P.C.

116 John Street, Suite 2830

New York, NY 10038

212-385-8036

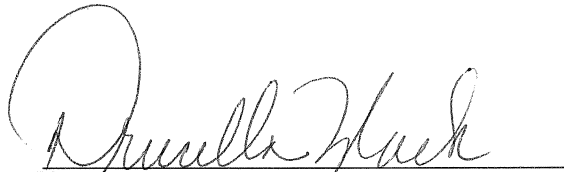
Attorneys for Plaintiff Dolores C. Omorebokhae

TO: KEVIN F. PINTER (KFP-P352)  
Gallo, Vitucci, Klar, Pinter & Cogan  
90 Broad Street, 3<sup>rd</sup> floor  
New York, NY 10004  
212-683-7100  
Attorneys for Defendant U-Haul Co. of New Jersey, Inc.

**CERTIFICATE OF SERVICE**

This is to certify that on June 18, 2008, I caused a copy of Plaintiff, Dolores Amorebokhae's Initial Disclosure Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure to Defendants, U-Haul Co. of New Jersey, Inc., and U-Haul International, Inc., to be delivered by mail to the following parties:

Kevin F Pinter, Esq.  
Gallo, Vitucci, Klar, Pinter & Cogan  
90 Broad Street, 3<sup>rd</sup> Floor  
New York, NY 10004  
(212) 683-7100

  
Drucilla Mack

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PLAINTIFF DOLORES OMOREBOKHAE INITIAL DISCLOSURE PURSUANT  
TO RULE 26(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE

**JOSEPH FLEMING, ESQ., P.C.**

Attorney(s) for Plaintiff

116 John Street, Suite 2830

New York, NY 10038

(212) 385-8036

To:

Service of a copy of the within  
is hereby admitted

Dated: \_\_\_\_\_, \_\_\_\_\_

Attorney (s) for

**PLEASE TAKE NOTICE**

○ **NOTICE OF ENTRY**

that the within is a (verified) true copy of a  
duly entered in the office of the clerk of the within named court on \_\_\_\_\_

○ **NOTICE OF SETTLEMENT**

after an order  
will be presented for a settlement to the HON.

of which the within is a true copy

To

Service of a copy of the within is hereby admitted.

Dated: \_\_\_\_\_

Attorney(s) for